

FLOWERS & O'BRIEN, LLC

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*Attorneys for Defendants, MYK Builders, LLC, LLC; Yousuf Khan,  
Aqeel Khan*

**UNITED STATES DISTRICT  
COURT DISTRICT OF NEW  
JERSEY TRENTON VICINAGE**

JEFFREY W. KUSMICK,  
Plaintiff

v.

NAJI ABISLEIMAN; THE ESTATE  
OF DAVID NAIM ABISLEIMAN;  
NADIA ABISLEIMAN AS EXECUTRIX  
OF THE ESTATE OF DAVID NAIM  
ABISLEIMAN; NADIA ABISLEIMAN,  
Individually; REA LLC; MYK  
BUILDERS, LLC, LLC; YOUSUF  
KHAN,  
Individually; AQEEL KHAN,  
Individually; GRO ARCHITECTS,  
PLLC; RICHARD  
GARBER, Individually; NICOLE  
ROBERTSON, Individually; CITY  
OF NEW BRUNSWICK; DANIEL  
DOMINGUEZ, Individually; ZEE  
ENGINEERING, LLC; ZULFIQARA  
CHOWDRY, Individually;  
CONSULTING ENGINEERS, 1-10;  
JOHN AND JANE  
DOES 1-10; Jointly and  
Severally

CASE NO. 3:23-cv-02219-  
GC-RLS

**NOTICE OF MOTION TO SET  
ASIDE ENTRY OF DEFAULT  
AND EXTEND TIME TO  
ANSWER ON BEHALF OF  
DEFENDANTS MYK BUILDERS,  
LLC, LLC YOUSUF KHAN  
AND AQEEL KHAN**

**TO:**

Jeffrey Kusmick  
1 Champlain Way  
Franklin Park, NJ 08823-1721  
*Pro Se*

Naji Abisleiman, the Estate of Naji Abisleiman, the Estate of  
David Naim Abeisleiman, Nadia Abisleiman as Executrix of the  
Estate of David Naim Abisleiman and REA, LLC

Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.  
5 Becker Farm Road  
Roseland, NJ 07068  
Atten: Michael K. Belostock and Jan Alan Brody

GRO Architects, PLLC, Nicholas Garber and Nicole Richardson.

Thompson Becker, LLC  
Atten: John M. Becker  
Ten Melrose Avenue  
Suite 400  
Cherry Hill , NJ 08003

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City of New Brunswick and Daniel Dominguez

The Stone Law Group  
Atten: Michael John Stone  
20 Glenview Drive  
Warren, NJ 07059

ZEE ENGINEERING, LLC, Zulfiqara, Zulfiqara Chowdry

Milber Makris Plousadis & Seiden, LLP  
75 Livingston Avenue  
Suite 103  
Roseland, NJ 07068

**PLEASE TAKE NOTICE** that on October 16, 2023, 2023 at 9:00 a.m. or  
as soon thereafter as counsel may be heard, the undersigned, Kerry  
Brian Flowers, Esq. of the firm Flowers & O'Brien, LLC, Counsel

for Defendants and Cross Defendants MYK Builders, LLC, Yousuf Khan and Aqeel Khan

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the Khan Defendants intend to rely on the attached Letter Brief and Declaration of Kerry Brian Flowers, Esq.

**PLEASE TAKE FURTHER NOTICE** that the Khan Defendants' proposed Answer is attached hereto.

Respectfully submitted,

/s/Kerry B. Flowers  
Kerry Brian Flowers

Dated September 20, 2023